

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

MARTÍN JONATHAN BATALLA  
VIDAL, *et al.*,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, *et al.*,

Defendants.

No. 16-cv-4756 (NGG) (JO)

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

JOSEPH R. BIDEN, *et al.*,

Defendants.

No. 17-cv-5228 (NGG) (JO)

**MOTION TO WITHDRAW AS COUNSEL**

Defendants hereby move the Court for an order, pursuant to Local Rule 1.4, permitting Christopher D. Dodge to withdraw as counsel for Defendants in this matter, as his employment with the United States Department of Justice will conclude on March 17, 2022. Defendants will continue to be represented by the United States Department of Justice and those federal attorneys who have entered appearances in these cases. A supporting declaration and proposed order are attached.

Dated: March 16, 2022

Respectfully submitted,

/s/ Christopher D. Dodge

Christopher D. Dodge

(MA Bar. No. 696172)

Trial Attorney

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